

U.S. App. Ser. No. 09/921,167
Attorney Docket: 056450/0119019
Amendment and Response to Office Action mailed 3/30/2006

REMARKS

Claims 1, 3-22, and 24-40 are pending in the application. Claims 2 and 23 have been cancelled. In the Office Action mailed March 30, 2006, claims 1, 3-22, and 24-40 stand rejected under 35 U.S.C. 102(e) as being anticipated by U.S. Patent 6,018,657 (Kennedy, III et al., hereinafter "Kennedy"). Claims 4 and 25 are further objected to because of improper dependency.

I. Claim Objections

Claims 4 and 25 are objected to because of improper dependency on cancelled claims. The Applicants have herein amended claim 4 to depend from claim 1 and claim 25 to depend from claim 22. No new matter is added by these amendments. Entry of these amendments is therefore respectfully requested.

II. Rejections under 35 U.S.C. 102(e)

Claims 1, 3-22, and 24-40 stand rejected under 35 U.S.C. 102(e) as being anticipated by Kennedy. The Applicants respectfully traverse the Examiner's rejections. The Applicants' invention provides an efficient mechanism by which messages may be transmitted *between* digital networks employing *noncompatible* communications protocols. In the invention of the Applicants, *the destination address is extracted, reformatted according to the protocol of the receiving network, and then placed into a new message formatted for the receiving network*. The other parts of the original message are then placed without change into the readdressed message that has been pre-formatted to meet the receiving network protocol.

In contrast, in Kennedy, messages are not transmitted between noncompatible networks, but rather are *transmitted merely between different parts of the same network* [Kennedy at col. 1, line 65 to col. 2, line 17]. While it is true that the method of Kennedy may be employed in an array of network types, each of those types potentially employing a different protocol, the teaching of Kennedy does not address transmission between such networks, but instead only provides a mechanism for transmission *between and within the various subsystems* (MSCs) comprising each such network, wherein all the subsystems employ the *same* protocol [Kennedy at col. 4, lines 15-33]. The different message "formats" of Kennedy, to the extent that they can

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even be considered as "formats", do not function to accommodate the requirements of different communications protocols of different communications networks, but rather only to accommodate the requirements of different message *purposes* within the *same* communications network. Kennedy does not in fact claim that these formats accommodate different protocols, indicating as an advantage of the Kennedy teaching that "consistent messaging formats" are used ("A particular technical advantage of the present invention is the use of consistent messaging formats and processing techniques that allow communication of messages in cellular telephone network 12") [Kennedy at col. 12, lines 11-15]. In fact, in interconnection facilities 24, Kennedy specifically employs only one protocol, the network protocol standard IS-41 [Kennedy at col. 4, lines 40-47; col. 5, lines 28-32]. Registration database 44 does not contain information related to different networks and their protocol requirements, but rather only contains information about the current network and its associated messaging units and external devices [Kennedy at col. 5, line 65 to col. 6, line 32].

Further, unlike the Applicants' invention, *the address of the message of Kennedy is not reformatted to conform to a different protocol*. In truth, *it is not reformatted at all*. Instead, the teaching of Kennedy is that, for messages going to a remote MSC, *additional routing information is appended to the "beginning" of the original message* [Kennedy at Fig. 3, col. 9, line 20 to col. 10, line 5; col. 10, lines 27-46; col. 12, lines 22-63]. As can be clearly seen in Fig. 3 of Kennedy, original message 102 is routed to a remote MSC by the addition of addressing information related to the originating MSC 116 and destination MSC 118, while *the original address information*, related to the originating MIN 110 and destination MIN 120, *remains in the message unchanged*. It is not reformatted, as is the address information of the messages of the Applicants ("....*translating the receiver identifier to a destination address that conforms to the mobile carrier addressing format type.*"). Treatment of the message shown at 130 and 140 in Fig. 3 of Kennedy is similar. In no case does Kennedy teach the type of address extraction and reformatting disclosed and claimed by the Applicants.

In order to more particularly call out and define the Applicants' invention, the Applicants have herein amended claims 1 and 22 in order to make it clear that the Applicants' invention provides an efficient means for sending messages *between* digital networks employing *different* network communications protocols. Consequently, the Applicants have amended independent claims 1 and 22 to call out that the Applicants' invention routes a message from a sender in a

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first digital mobile network employing a first digital mobile network protocol to an intended receiver in a second different digital mobile network, the second digital mobile network employing a second digital mobile network protocol that is different from the first network protocol and that, in the Applicants' invention, a receiver identifier contained in associated message routing information and associated with the intended receiver is related to corresponding routing format information associated with the second digital mobile network protocol, the routing format information associated with the second digital mobile network protocol comprising at least a second protocol mobile carrier interface format type and a second protocol mobile carrier addressing format type. Support for these amendments is found at least in the Abstract, at paragraphs [0069], [0080], [0105], [0108], and [0131] and in Figs. 4 (elements 228, 232, 234) and 8-13 of the published application. No new matter has been added by these amendments.

The Applicants claimed method and computer program implementing a method of routing a message from a sender in a first digital mobile network to an intended receiver in a *second different* digital mobile network that employs a *different network protocol* from that employed by the first digital mobile network is therefore not shown in Kennedy, the art of record, nor in any other prior art. Claims 1 and 22 are therefore not anticipated nor rendered obvious by Kennedy, by any other reference of record, or by any other prior art, whether taken alone or in combination. Allowance of claims 1 and 22, as amended, is therefore respectfully requested.

Because claims 3-21 depend from independent claim 1, which is in condition for allowance, the Applicants believe that claims 3- 21 are also in condition for allowance. Similarly, because claims 24-40 depend from independent claim 22, which is in condition for allowance, the applicants believe that claims 24- 40 are also in condition for allowance. Allowance of claims 3- 21 and 24-40 is therefore respectfully requested.

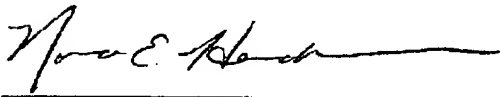
III. Conclusion

Claims 1, 4, 22, and 25 have been amended. The Applicants respectfully submit that claims 1, 3-22, and 24-40 are now in condition for allowance. For this reason, and in view of the foregoing arguments, the Applicants believe that this application is now in condition for allowance, which action is earnestly solicited. Should there remain any unresolved issues, it is

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respectfully requested that the Examiner telephone Norma E. Henderson, Applicants' Attorney,
at 603-437-4400, so that such issues may be resolved as expeditiously as possible.

Respectfully Submitted,



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Date

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